

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No.: 19-10080-NMG
)	
GAMAL ABDELAZIZ <i>et al.</i> ,)	
)	
Defendants)	

**GOVERNMENT’S MOTION FOR RULING
ON OBJECTIONS OUTSIDE THE PRESENCE OF THE JURY**

During the status conference on September 30, 2021, counsel for the defendants indicated that they are seeking to introduce a large number of exhibits, many of which are inadmissible as hearsay and for other reasons. The Court has already ruled many of these exhibits inadmissible and indicated during the status conference that it is likely to sustain the government’s objections to many others. The government respectfully requests that the defendants offer *en masse* the exhibits that they seek to introduce, and that this process occur outside of the presence of the jury. Otherwise, the process of offering exhibits one-by-one that are clearly inadmissible is highly prejudicial to the government, and a waste of the jury’s time and the Court’s resources. The defendants can preserve their appellate rights by moving *in limine* to admit the exhibits or by offering them *en masse* outside the presence of the jury. *See* Fed. R. Evid. 103(d) (“To the extent practicable, the court must conduct a jury trial so that inadmissible evidence is not suggested to the jury by any means.”).

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Dated: October 1, 2021

/s/ Ian J. Stearns
IAN J. STEARNS